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Attorneys for Class Members Sedee Keita and Eric Ayala

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE COLLEGE ATHLETE NIL
LITIGATION

Case No.: 4:20-cv-3919-CW

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO
RESPOND TO PLAINTIFFS'
ADMINISTRATIVE MOTION
FOR PROSPECTIVE ORDER
CONCERNING THIRD-PARTY
CLAIMS BUYOUT SERVICES
(ECF NO. 1015)**

Judge: Hon. Claudia Wilken

Pursuant to Civil Local Rule 6-3, class members Sedee Keita and Eric Ayala hereby respectfully request additional time to respond to Plaintiffs' Administrative Motion for Prospective Order Concerning Third-Party Claims Buyout Services ("Buyout Motion") (ECF No. 1015).

On March 1, 2024, the Court approved a modified version of Plaintiffs' proposed class-notice plan. ECF No. 406. On June 6, 2025, the Court approved a modified version of Plaintiffs' Fourth Amended Stipulation and Settlement Agreement with Defendants. ECF No. 979. On August 11, months later, Plaintiffs

1 filed the Buyout Motion. They requested, among other things, to alter portions of the
2 class-notice materials and to require that settlement payments be made directly to
3 Class Members. *See* Mot. at 2–3. Under Local Rule 7-11(b), any response to the
4 motion was due four days later, on August 15. Upon learning of the Buyout Motion,
5 Messrs. Keita and Ayala became concerned that the requested relief may unduly
6 complicate their efforts to sell their settlement claims and impose similar unnecessary
7 burdens on other Class Members. As such, both individuals intend to present their
8 position to class counsel in the hopes of reaching a mutual resolution. So, on August
9 15, Messrs. Keita and Ayala retained the undersigned counsel. While the outcome of
10 those discussions remains pending, and to avoid prejudicing their ability to file a
11 substantive response, Messrs. Keita and Ayala seek this extension.

12 Messrs. Keita and Ayala do not oppose (and thus do not seek an extension for)
13 the portion of the Buyout Motion seeking to reopen the claims period. Class counsel
14 does not oppose the requested extension to respond to the claims-purchase aspect of
15 the Buyout Motion.

16 No other modifications of time to respond to the Buyout Motion have been
17 made in this action. The requested modification would not have any other effect on
18 the schedule for this case.

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20 DATED: August 15, 2025

KATZ RUBY & CARLE LLP

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25 *Counsel for Class Members Sedee*
26 *Keita and Eric Ayala*
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